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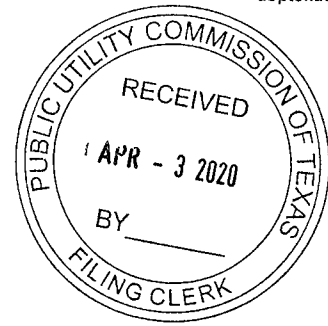
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AEP TEXAS

An AEP Company

BOUNDLESS ENERGY

April 3, 2020

Ana Trevino
Filing Clerk
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, TX 78711

RE: PUC Docket No. 50664 *Issues Related to the State of Disaster for Coronavirus Disease 2019*

Dear Filing Clerk:

On April 2, 2020, the Joint TDUs (AEP Texas, CenterPoint, Oncor, and TNMP) held a workshop with the REPs relating to the COVID-19 Electricity Relief Program (ERP) process. Attached the presentation prepared by the Joint TDUs for that workshop that contains information on the COVID-19 ERP process.

Sincerely,

/s/ Jim Lee

Jim Lee
AEP Texas

Attachment

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TDU & REP Workshop:

COVID-19 Electricity Relief Program (ERP)

APRIL 2, 2020

Background

On March 26, 2020, the Public Utility Commission of Texas (PUCT) adopted an order in Project No. 50664, Issues Related to the State of Disaster for Coronavirus.

The order establishes the COVID-19 Electricity Relief Program (ERP), which, among other things, creates an assistance program for eligible residential customers of retail electric service in competitive areas of Texas who are financially impacted by COVID-19.

Today's workshop is a collaboration session between the Joint Transmission & Distribution Utilities (TDUs*) and the Retail Electric Providers (REPs) to discuss the proposed processes and procedures that the TDUs have developed to facilitate the requirements within the order using a standard methodology.

*Joint TDUs: AEP Texas, CenterPoint, Oncor, and TNMP

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Summary of COVID-19 Electricity Relief Program

The COVID-19 ERP is established as a customer assistance program for residential customers who experience financial and/or employment hardships as a result of COVID-19. Customers who qualify for the COVID-19 ERP will not be subject to disconnection for non-pay as a result.

- Customer must self-enroll with Solix to qualify for COVID-19 ERP

- Solix will coordinate information exchange of customer eligibility with REPs

- REP must offer customers who express financial and/or employment hardship with Deferred Payment Plans (DPP) or payment arrangement options

- REPs must cease submitting disconnection for non-pay orders for eligible residential customers enrolled in COVID-19 ERP

- For eligible customers, TDUs will cease charging REPs for delivery charges, except securitization-related charges

Funding of COVID-19 Electricity Relief Program

In addition to the initial ERCOT contribution, each TDU has implemented a tariff rider (Rider ERP) to collect funds for the COVID-19 Electricity Relief Program.

- The funds collected will be utilized to reimburse TDUs and REPs for unpaid bills from eligible residential customers experiencing unemployment due to impacts of COVID-19

- Initial Rider ERP charge amount of $0.33 per MWh – to be applied across all customer classes

- COVID-19 ERP Fund will reimburse the following:
  - REP energy charges ($0.04/kwh)
  - TDU delivery charges
  - 3rd party administrator cost of administrating COVID-19 ERP
  - ERCOT for initial contribution

- REPs must submit one spreadsheet with reimbursement claims to TDUs on the 15th of each month

- TDUs will reimburse REPs within 14 days

- TDUs will file monthly reports to the PUCT on the COVID-19 ERP showing aggregate amounts of reimbursement to the TDUs and REPs

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TDU Delivery Charge
Suppression
Process

Process for TDU Delivery Charge Suppression

The TDUs are proposing the following process for REPs to request the suppression of TDU delivery charges.

Proposed Process:

1. REPs to submit issue through MarkeTrak
2. Submit only one (1) ESI ID per MarkeTrak issue
3. Use **Market Rule** subtype
   - For Adds, use "**ERP_A**" in Market Rule Field
   - For Deletes, use "**ERP_D**" in Market Rule Field
     - REPs do not need to submit "ERP_D" (Delete) for any Move Outs
4. For Bulk Insert purposes only:
   - Use only one (1) ESI ID per line on the Bulk Insert template
   - Must populate "Market Rule" field with "**ERP_A**" or "**ERP_D**" to distinguish Adds and Deletes on the Bulk Insert template
   - Must populate "Comment" field with "**CV19**" on Bulk Insert template.

ESI ID (1)	Orig Tran ID (required if 867_03F) (2)	Tran Type (3)	Transaction Date (4)	GS Number (5)	Comments (required if Reject Cd = A13) (6)	ESIID Duplicate Check (7)	Global ID Duplicate Check (8)	Assignee (9)	ESIID Validation (10)	Market Rule (38)
Opt	Opt	Opt	Opt	Opt	Req	Opt	Opt	Req	Opt	Req

<u>Timing related to TDU Delivery Charge Suppression</u>

IMPORTANT:

Suppression of TDU Delivery Charges will appear on the next cycle invoice following the TDU's processing of the suppression request. The TDU shall complete processing the suppression of the Delivery Charges within three (3) business days of receipt of the REP's MarkeTrak request to suppress charges.

Day 1 will be considered the day the MarkeTrak request is received, provided the TDU receives the MarkeTrak request by 4:00 PM CPT on a Business Day. Otherwise, Day 1 will be considered the next business day.

REP Reimbursement Spreadsheet Process

Process for Reimbursement Spreadsheets

Proposed Process:

1. Each REP DUNS will send 1 spreadsheet monthly, on the 15th of each month via MarkeTrak and use Market Rules subtype with "ERP_R" in the Market Rules field
   (NO BULK INSERT MarkeTrak)

2. Only 810 invoices where TDU delivery charges are suppressed are valid to be included on the spreadsheet

3. REP shall use separate lines on the spreadsheet to indicate Original vs Cancel vs Rebill
   ◦ If the ESI ID is rebilled, then the rebilled invoice must be shown on the same spreadsheet with the associated cancel invoice
   ◦ Cancel must be shown as a negative number (-)

4. REP must populate the BIG02 number within the spreadsheet as the unique identifier when submitting reimbursement details

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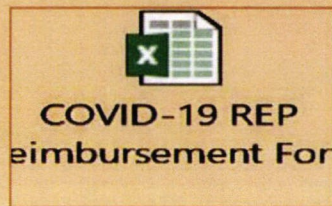# Process for Reimbursement Spreadsheets (con't)

5. TDUs shall return validated spreadsheets to REPs when completing the MarkeTrak

   o TDUs shall make reimbursement via EFT to the REPs within 14 days of receipt of the MarkeTrak for all valid ESI IDs

   o TDU shall provide comments on the spreadsheets for any invalid requests (not REP of Record, no suppressed charges, incorrect kWhs, etc)

   o For any invalid information requiring corrections, REPs may submit one (1) separate, secondary 'correction' spreadsheet per month, limited only to the information that required corrections

     • Corrected information should be submitted in a separate, secondary spreadsheet with corrected ESIIDs only

     • REPs must submit separate, secondary 'correction' spreadsheet within 3 business days of receiving the TDU response to the original submission

     • Correction spreadsheet must be submitted via NEW MarkeTrak issue under Market Rules subtype using "ERP_R" in the Market Rules field

     • REPs shall not add additional ESI IDs for reimbursement on 'correction' spreadsheet

     • The 14 day reimbursement clock will restart on the day the TDU receives the corrections via new MarkeTrak issue

Process for Reimbursement Spreadsheets (con't)

MarkeTrak Process:

1. REP to submit issue through MarkeTrak on the 15th of each month
2. Submit only one (1) file for each REP DUNS (+4)
3. Bulk Insert CANNOT BE USED for reimbursement spreadsheet
4. Use *Market Rule* subtype
   - Must use "*ERP_R*" in Market Rule Field to indicate Reimbursement
5. Attach monthly reimbursement spreadsheet to the MarkeTrak issue

Standardized Reimbursement Spreadsheet:

COVID-19 REP eimbursement For

Reimbursement Spreadsheets Details

COVID-19 ELECTRICITY RELIEF PROGRAM (ERP) REIMBURSEMENT REQUEST

Enter TDU Name here.

Invoice#:	Enter MarkeTrak Number.
Date Submitted:	Enter date information submitted to TDU.
Retail Electric Provider:	Enter name of Retail Electric Provider.
DUNS Number:	Enter DUNS Number for REP.
Vendor Number:	Enter Vendor Number for REP.
REP Contact Person:	Enter contact name.
Contact Phone Number:	Enter contact phone number.
Contact E-mail:	Enter contact e-mail address.
Total Number of ERP ESI IDs:	Enter Total Number of ESI IDs Requested.
Total kWhs for Reimbursement: (Auto populated)	0
Total Reimbursement Requested: (Auto populated)	$0.00
Total ESI IDs Reimbursed: (Completed by TDU)	
Total Reimbursement Paid: (Completed by TDU)	

- REP to populate the fields in BLUE

- Entries in BLUE will auto-populate rows 1-3 on the Reimbursement Details worksheet.

Tip:
Upon receipt of the TDU response file, REPs can quickly confirm if their 'total reimbursement requested' amount matches the 'total reimbursement paid' amount.

Different amounts would suggest a possible invalid claim.

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Reimbursement Spreadsheets Details

REP Name:	Enter name of Retail Electric Provider.		REP DUNS: ber for REP.
Submittal Date:	Enter date information submitted to TDU.		MarkeTrak#: rak Number.
TDU:	Enter TDU Name here.		

	Requested Amounts	Validated Amounts
Total kWhs:	0	0
Total Reimbursement Request:	$ -	$ -

Request Detail (REPs enter columns A, B, C and D) | | | | | | **TDUs to Complete** | | |

ESI ID	810_02 Invoice # (BIG02)	Invoice Type Original(O) / Cancel(C) / Rebill(R)	kWhs	Energy Rate	Energy Charges	Validated kWhs	Validated Charges	Comments
				$ 0.04	$ -		$ -	
				$ 0.04	$ -		$ -	
				$ 0.04	$ -		$ -	
				$ 0.04	$ -		$ -	
				$ 0.04	$ -		$ -	
				$ 0.04	$ -		$	

REP Instructions:

1) Enter a line item for each ERP eligible ESI ID and include:
   - 810_02 Invoice # (BIG02)
   - Invoice Type
   - kWh requesting reimbursement

2) Corrections should use a new spreadsheet containing only the corrected ESIIDs

TDU Response:

- TDU will validate the kWh
- TDU will validate charges
- Invalid claims will be identified in the "Comments" section
- TDU will populate "Total ESIIDs Reimbursed" and "Total Reimbursement Paid" fields on Summary sheet

Reimbursement Distribution

TDUs will use Electronic Funds Transfer (EFT) to facilitate reimbursement payments to REPs

- REPs must fill out any necessary EFT forms required by the TDU before reimbursement requests can be submitted.
- Each TDU will assign a unique Vendor # to each REP DUNS (+4) to use on the Reimbursement Summary sheet.
- TDUs will coordinate with each REP to provide the Vendor #

810_02 Invoice
Impacts

810_02 Invoice Impacts

Rider ERP

1. TDUs will use SAC04 code "MSC024" on the 810_02

2. SAC15 description of "Electricity Relief Program"

TDU Delivery Charge Suppression

1. TDUs will suppress all monthly TDU delivery charges, except for securitization-related charges

2. TDUs will suppress all discretionary charges, except for Late Payment Charges (LPCs) and Tampering charges

810_02 Invoice Impacts (con't)

CenterPoint-specific 810_02 Suppression Practices:

1. CenterPoint will bill securitized charges as applicable:

SAC 04	Description	
DSC004	CHARGE OFF ALLOWANCE TC4	If applicable
DSC006	CHARGE OFF ALLOWANCE TC5	If applicable
MSC038	TRANSITION CHARGE 4	
MSC043	TRANSITION CHARGE 5	
CRE031	ADFIT CREDIT	If applicable

Oncor-specific 810_02 Suppression Practices:

1. All of Oncor's securitized charges have expired, so Oncor will not bill any securitized charges.
2. Oncor will include a single line item on the invoice with a SAC04 code of MSC024 for the rider and it will show associated kWhs usage with a zero dollar amount.
3. Following is a sample of what the EDI line item will look like on the 810 for Oncor:

```
SAC*C**EU*MSC024*0***0*KH*180*****ELECTRICITY RELIEF PROGRAM~
```

810_02 Invoice Impacts (con't)

<u>TNMP-specific 810_02 Suppression Practices:</u>

1. The invoice will display a single line item with a SAC04 code of MSC024 and will show zero kWhs and zero dollars.

2. The consumption will be reflected on the 867_03.

<u>AEP Texas-specific 810_02 Suppression Practices:</u>

1. AEP Texas will bill securitized charges as applicable

2. AEP Texas will provide all line items on the 810 invoice so REPs can reconcile the kWhs being charged, then show a one line credit with SAC04 code "CRE020" to net all the delivery charges to $0.00

3. The table below contains the securitization-related charges for the AEPTX tariffs:

Delivery Charges will be suppressed. The Charges below WILL NOT be suppressed	
TCC	
Description	SAC04 Code
ADFIT	CRE031
Transition Charge 2	MSC036
Transition Charge 3	MSC037
System Restoration	MSC038
TC2 Charge Off Allowance	DSC002
TC3 Charge off Allowance	DSC003
Storm Restoration Charge Off Allowance	DSC004
TNC & Sharyland	
Description	SAC04 Code

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QUESTIONS?